

January 11, 2022

VIA ECF

The Honorable Analisa Torres, USDJ
United States District Court, SDNY
500 Pearl Street, Courtroom: 15D
New York, 10007 NY

USDC SDNY
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RE: Shaw v. ProCore, LLC
Civil Action No.: 1:21-cv-03883 (AT)

Dear Judge Torres:

Our firm represents Defendant ProCORE, LLC in the above-referenced matter. Please accept this joint status letter submitted on behalf of both parties, in advance of the case management conference scheduled for January 18, 2022 before Your Honor.

I have recently entered my Notice of Appearance for Defendant, as Brian Tremer is no longer with the firm. I have reached out to Plaintiff's counsel, and the parties are in the process of responding to written discovery. In light of these recent events, the parties respectfully request an extension of the discovery deadline to 60 days from the date of this request. A corresponding adjournment of the January 18, 2022 case management conference is also requested. The parties intend to complete written discovery during this accelerated period and to resume settlement discussions.

We appreciate Your Honor's courtesies and consideration of this request.

Respectfully submitted,

NUKK-FREEMAN & CERRA, P.C.

/s/ Erica M. Clifford

Erica M. Clifford, Esq.

GRANTED. Fact discovery shall conclude by **March 11, 2022**. The case management conference scheduled for January 18, 2022, is ADJOURNED to **March 28, 2022**, at **11:40 a.m.**

SO ORDERED.

Dated: January 13, 2022
New York, New York


ANALISA TORRES
United States District Judge